

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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JANE DOE 1, individually, and on behalf of all others similarly situated, JANE DOE 2, individually and on behalf of all others similarly situated, JANE DOE 3, individually and on behalf of all others similarly situated, JANE DOE 4, individually and on behalf of all others similarly situated, JANE DOE 5, individually and on behalf of all others similarly situated, and JANE DOE 6, individually and on behalf of all others similarly situated,

Plaintiffs,

v.

GOVERNMENT OF THE UNITED STATES VIRGIN ISLANDS, FIRST LADY CECILE DE JONGH, GOVERNOR KENNETH MAPP, SENATOR CELESTINO WHITE, ATTORNEY GENERAL VINCENT FRAZER, GOVERNOR JOHN DE JONGH, SENATOR CARLTON DOWE, DELEGATE STACEY PLASKETT, and JOHN DOES 1-100,

Defendants.

Civil Action No:  
1:23-cv-10301-AS

**NOTICE OF MOTION**

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**PLEASE TAKE NOTICE** that, upon the accompanying Memorandum of Law, dated December 14, 2023, plaintiff Jane Doe 6 by and through undersigned counsel, respectfully seeks an Order from this Court at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, for leave to proceed anonymously under a pseudonym in this action pursuant to Rule 10(a) of the Federal Rules of Civil Procedure.

Dated: December 14, 2023  
New York, New York

Respectfully submitted,

**MERSON LAW PLLC**

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Jordan Merson, Esq.  
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*Counsel for Plaintiff*